

UNITED STATES DISTRICT COURT  
SOUTHERN DIVISION OF OHIO  
EASTERN DIVISION

IN RE: DAVOL, INC./C.R. BARD,  
INC., POLYPROPYLENE HERNIA  
MESH PRODUCTS LIABILITY  
LITIGATION

Case No.: 2:18-md-2846

JUDGE EDMUND A. SARGUS, JR.  
Magistrate Judge Kimberly A. Jolson

This document relates to:  
ALL ACTIONS.

**PLAINTIFF'S NOTICE OF THE VIDEOTAPED DEPOSITION DUCES TECUM  
OF STEVE ELDRIDGE**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition of STEVE ELDRIDGE ("deponent"). The deposition shall be taken by stenographic and videographic means before a Notary Public, or other person authorized to take oaths pursuant to Fed. R. Civ. P. 28, at **9:00 am (ET) on Wednesday, November 16, 2022, at the Renaissance Providence Downtown, 5 Avenue of the Arts, Providence, RI 02903.** The deposition will continue from day-to-day excluding Sundays and court-recognized holidays, until examination is completed. **The deponent is further requested to bring to the deposition any documents and/or tangible things described on Exhibit A.**

Dated: October 20, 2022

Respectfully submitted,

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**Attorneys for Plaintiffs**

**EXHIBIT A – DUCES TECUM**

Plaintiff requests that the deponent bring to the deposition and allow counsel to inspect and copy the following documents and/or tangible things:

1. The deponent's current curriculum vitae.
2. If, at the time of deposition, the deponent is no longer an employee of the Defendants and/or Becton Dickinson, all materials still in his/her possession relating to any C.R. Bard hernia mesh device.
3. Any and all evaluations or self-evaluations relating to the deponent's job performance with the Defendants and/or Becton Dickinson as it pertains to any C.R. Bard hernia mesh device.
4. If, at the time of deposition, the deponent is no longer an employee of the Defendants and/or Becton Dickinson, all documents reflecting any contracts, agreements, and/or payments made to the deponent by Defendants and/or Becton Dickinson after termination of employment (*e.g.*, termination or severance agreements).
5. Any and all documents in deponent's custodial file that have not previously been produced and which are responsive to the agreed-upon search terms for this litigation and are not subject to a claim of privilege.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 20, 2022, a true and correct copy of the foregoing was served via email to counsel for Defendants:

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